# SESSION 1
# Coordination and Integration of DOE Line and Independent Oversight and Contractor Self-Assessment

## *Session Members*

Milt Johnson, SC-1, Chair
Leah Dever, OR
Dave McGraw, LBNL
Emil Morrow, NA-1
Glenn Podonsky, OA-1
Ken Powers, Kaiser-Hill Company
Charles Shank, LBNL

## *Facilitators*

S. David Stadler, EH-2
Ed Blackwood, EH-24

The following topics were researched and discussed by the breakout session committee:

* Reducing layers and redundancy in DOE oversight (Lead – Glenn Podonsky)
* Coordinating line and independent oversight schedules (Lead – Emil Morrow)
* Voluntary accreditation of contractor self-assessment programs (Lead – Dave McGraw)
* Focusing DOE oversight on contractor self-assessment and performance indicators versus direct oversight of workers (Leads – Leah Dever and Ken Powers)
* A Laboratory Director's perspective (Lead – Charles Shank)

### Action Items

* Develop pilot programs for integrated planning of oversight activities that reflect the various types of DOE facilities (i.e., science, environmental management, and defense programs). Use these pilots to help identify how requirements and oversight could be scaled to risk while maintaining excellent safety performance standards. (Lead – H. Boston, others TBD)
* Define and evaluate the concept for establishing a certification program for DOE contractor self-assessment programs. (Lead Facilitator – D. Stadler)
* Develop a performance management system that provides the appropriate indicators that can be used as a tool in establishing line and independent oversight and review priorities. (Lead Facilitator – D. Stadler)
* Provide a progress report at the Spring 2002 ISMS Workshop and a path forward for full implementation (Lead – M. Johnson)

The committee reviewed the external and internal safety oversight mechanisms imposed upon DOE offices and programs with emphasis on oversight responsibilities set forth in DOE P 450.5, "Line Environment, Safety, and Health Oversight," and in National Nuclear Security Administration's (NNSA) protocols. Among the areas discussed were current initiatives of the Office of Independent Oversight and Performance Assurance to improve coordination and prioritization of oversight activities, integration of industry standards into the assessments, consolidation of requirements, communication of effective practices and lessons learned, and the move toward self-assessments and

focused sampling. Lawrence Berkeley National Laboratory's self-assessment program accreditation was presented by the Laboratory. It is an evolving model program based on an Integrated Safety Management (ISM) Institutional Plan that requires robust performance criteria and measures, leading indicators, ratings and reporting, senior management involvement, occasional internal and external high-level systems reviews, and integration of best practices. Also presented were the experiences and challenges in focusing on DOE oversight while moving toward a contractor self-assessment process. Lessons learned at the Oak Ridge National Laboratory and Rocky Flats Environmental Technology Site supported these discussions.

## Principle Findings and Recommendations

The dialogue during the session was extensive with the committee concurring on three primary findings.

***1. Agreement on General Principles for Line and Independent Oversight***

The committee re-affirmed that DOE P 450.4, "Safety Management System Policy," is an effective policy to follow for line oversight to ensure ISM is implemented. DOE line oversight should be coordinated, integrated, risk-based, and performance-based to be cost-effective and efficient. A vigorous contractor self-assessment program, using the contractors own performance-based management systems to evaluate risks and set priorities, should be a cornerstone of the program. Independent oversight should be utilized to complement DOE line oversight.

***2. Agreement on Improving Efficiencies***

An integrated and risk-based planning approach should be developed for all oversight activities, including a single point of entry to the contractor. Oversight roles and responsibilities should be established for the contractor, field element, facility representative, program office, and independent oversight entity to improve efficiencies, eliminate duplication, foster delegation to the appropriate levels, establish accountability, and manage risks with confidence. Oversight costs should be benchmarked to help set goals to aspire to in terms of cost efficiencies. Finally, oversight mechanisms and frequencies should be linked to performance records, rewarding the exemplary performers with reduced oversight requirements.

***3. Agreement on Improving Contractor Self-Assessment Programs***

DOE should develop a system to identify and share best practices in the DOE contractor self-assessment programs as significant progress has been made in this area, particularly with the national laboratories. Existing internal and external certification programs, such as Voluntary Protection Program (VPP) and ISO 14001[1], should be evaluated and benchmarked. The concept of a certification program for DOE contractor self-assessment programs should be further defined and evaluated. Pilot programs and peer reviews, as a mechanism for self-assessment, were also

[1] ISO 14001, Environmental Management Systems, published by the International Organization for Standardization

recommended to develop credibility and confidence in emerging contractor self-assessment programs and concepts.

## At Issue

Comments by the conference participants identified the following subjects at issue and/or re-affirmed committee findings. First, concrete "how to" mechanisms to prevent the recommendations from being perceived as "business as usual" were requested. The committee chair responded that an immediate action would be to establish pilot programs, mirroring the U. S. Nuclear Regulatory Commission model, for sites with varying risks. Each pilot program should be designed to achieve oversight comparable to a best-in-class business through risk-based trigger points. Longer-term action items would be to establish integrated planning, focused implementation, increased line accountability, and utilization of self-assessments such as those emerging in the national laboratory program.

Other major comments included the Department's need to identify its overarching safety management policy, as currently there are conflicting policies subject to liberal interpretation. A suggested root cause is that DOE tends to use oversight as quality control rather than quality assurance and tends to confuse oversight with instruction. The line and independent oversight process needs to be flexible to address all types of DOE sites/programs (e.g., accelerated site closures, national laboratories, and nuclear weapons complex sites). The oversight process should also balance the need to provide a measure of consistency with offering flexibility based on risks posed by the site/program and history of performance. The roles and responsibilities, such as those for facility representatives, need to be defined and line accountability in DOE for safety must be established and implemented, particularly following incidents. Finally, a system should be developed to capture lessons learned and information generated from pilots and other programs, in order to capitalize on and facilitate innovation and reduce requirements, particularly List B requirements. Under Secretary Card challenged field offices and contractors to conduct, support, and/or copy, as appropriate, pilot studies. It was also recommended that both DOE and the contractors work toward defining performance metrics that will achieve mutually supported goals in ES&H performance.